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Attorneys for ROE CL Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

| Case No.: 3:23-md-03084-CRB

Hon. Charles R. Breyer

This Document Relates to:

**PLAINTIFFS' MEMORANDUM IN
SUPPORT OF OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS
CASES FOR FAILURE TO COMPLY
WITH COURT ORDER**

Jane Roe CL 178 v. Uber Technologies, Inc., et al., No. 3:25-cv-05537-CRB

Date: October 31, 2025

| Time: 10:00 a.m.

Courtroom: 6 – 17th Floor

Jane Roe CL 179 v. Uber Technologies, Inc., et al., No. 3:25-cv-05538-CRB

Jane Roe CL 181 v. Uber Technologies, Inc., et al., No. 3:25-cv-05628-CRB

Jane Roe CL 182 v. Uber Technologies, Inc., et al., No. 3:25-cv-05633-CRB

I. INTRODUCTION

On September 15, 2025, Defendants filed a Motion to Dismiss cases of Plaintiffs who did not file a Plaintiff Fact Sheet (“PFS”) in connection with Pretrial Order (“PTO”) 10. (Doc. 3912). Counsel acknowledges and understands that under PTO 10, the court created procedures and deadlines to produce a PFS. Counsel has diligently attempted to comply with the production of

1 the documents required for the discovery obligation of each of the Plaintiffs addressed in this
2 motion. During the course of litigation, a Plaintiff may become unavailable for a variety of
3 reasons. Counsel has utilized extensive efforts to reach each of the clients, predating the filing of
4 Defendant's motion. (Domer Decl. at ¶ 4).

5 **ARGUMENT**

6 Counsel has worked diligently in reaching the above referenced claimants, including
7 alternate contact information, various methods of outreach such as text, email, and mailing.
8 Counsel is continuing in our efforts to reach the remaining clients as described in the attached
9 Declaration and will continue to do so.

10 **II. CONCLUSION**

11 For the foregoing reasons, Counsel respectfully requests that the claims for Plaintiffs Jane
12 Roes CL 178, 179, 181, and 182 be given additional time to produce the information required, as
13 Counsel continues to follow up in various methods to locate and reach them.

14
15 Dated: September 29, 2025

CUTTER LAW P.C.

16 By: /s/ Jennifer S. Domer

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18 Jennifer S. Domer (SBN 305822)
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24 *Attorneys for ROE CL Plaintiffs*

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that, on September 29, 2025, I electronically filed the following with the
3 Clerk of the Court using the CM/ECF system, which will send notification of such filing via
4 electronic mail to all counsel of record as maintained in the CM/ECF electronic system.

5
6 Dated: September 29, 2025

CUTTER LAW P.C.

7 By: /s/ Jennifer S. Domer

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